

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Scott Sams

Case: 2:21-mj-30586

Assigned To : Unassigned

Case No. Assign. Date : 12/10/2021

Description: USA V. SCOTT SAMS  
(CMP) (MEV)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 2021 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

21 U.S.C. §§ 846

Conspiracy to distribute controlled substances

This criminal complaint is based on these facts:

See affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: December 10, 2021

City and state: Detroit, MI



*Complainant's signature*

Special Agent Erica Kelley

*Printed name and title*



*Judge's signature*

Hon. Kimberly G. Altman, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Erica Kelley, being first duly sworn, hereby depose and state as follows:

1. I am currently employed as a Federal Bureau of Investigation (FBI) Special Agent and have been since September of 2017. Prior to my employment with the FBI, I worked as a local police officer. I have participated in numerous investigations related to illegal drug trafficking, among other things, have conducted or participated in surveillances, the execution of search warrants, and debriefings of informants as related to drug trafficking and money laundering. I have gained experience through training and everyday work-related experience in these types of investigations.
2. The statements contained in this affidavit are based on my experience and background as a special agent and on information provided by police officers, federal agents, and other law enforcement personnel, including communications with others who have personal knowledge of the events and circumstances described herein, as well as information gained through training and experience.
3. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all the information known to law enforcement related to this investigation.
4. I am currently investigating **Scott Christopher Sams**, date of birth

xx/xx/1969, for violations of federal law, specifically, violations of 21 U.S.C. § 846, conspiracy to possess with intent to distribute controlled substances (methamphetamine). **Sams** is currently on state probation in this district and was last residing in the Lincoln Park, Michigan area.

5. At sometime within the first two weeks in June 2021, Livonia Police Department utilized a Confidential Informant (CI) to conduct an undercover drug buy from **Sams**. On the day of the buy, the CI contacted **Sams** through Facebook Messenger to inquire about the purchase of a quantity of methamphetamine. **Sams** then instructed the CI to meet him a hotel to conduct the transaction.
6. The CI was searched by law enforcement personnel of Livonia Police Department prior to the undercover purchase and no drugs or money were found. Officers provided on scene surveillance throughout the duration of the undercover operation. The CI met with **Sams** at the predetermined location and purchased between 10-18 grams of meth. After the purchase the CI provided the meth to Livonia Police. The CI stated that he/she went into the hotel room and met with **Sams**. **Sams** handed the meth to the CI and the CI then provided **Sams** with the money. Livonia Police conducted an on-scene field test of the suspected meth which tested positive for methamphetamine.

7. An FBI cooperating witness (CW) gave consent to view Facebook messages between them and **Sams**. Within the last week of June 2021, the CW and **Sams** had the following conversation:

CW: MY man. Anything available  
**Sams**: Just some personal I have  
CW: That's all im looking for  
**Sams**: Could sell a ball  
CW: How much And where I gotta go  
**Sams**: How much you want to pay I cant do [xx] price  
I'm reasonable  
CW: Really would like to get 1 ¼ or so but idk whats it  
goin.  
My guy been doing 100 a ball  
**Sams**: I can give you a ball for like 175 but that's about  
the cheapest I can go. I'm in Lincoln Park. That  
shit's Fire 2  
CW: Yea I feel you  
**Sams**: I will give it to you fir 150

8. Based on my training and experience I believe this conversation is about a drug transaction. A "ball," also referred to as an "8 ball," is an eighth of an ounce of narcotics or 3.5 grams. When **Sams** says "I can give you a ball for like 175" I believe he means that he will charge CW \$175 dollars for an eighth of an ounce of narcotics.



9. **Sams** was arrested by local police on November 9, 2021 for state warrants. Three cell phones belonging to **Sams** were seized and a subsequent federal search warrant was signed to search the phones. On one phone, there are five images of what appear to be crystal meth in plastic baggies and on scale. The images were taken with **Sam's** phone on June 2021.
10. On November 8, 2021, **Sams** sent a text message stating, "Tomorrow we meet with my dude we all see what he gives me I think he's going to give me a pound so we can work this s\*\*\* I talked to him a little while ago." Through my training and experience, I believe **Sams** is referring to a pound of methamphetamine.
11. Based on the above information, probable cause exists to believe that Scott **Sams** violated 21 U.S.C. § 846, conspiracy to possess with intent to distribute controlled substances.

  
Special Agent Erica Kelley, FBI

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

A handwritten signature in black ink, appearing to read "Kim G. Altman", written over a horizontal line.

Hon. Kimberly G. Altman  
United States Magistrate Judge

Dated: December 10, 2021